

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

CIVIL ACTION NO. 1:04-CV-10797-GAO

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS

MARK ULIANO,
Plaintiff

vs.

MARIE H. BISSELL and
KENNETH J. TILDEN,
Defendants

PLAINTIFF, MARK ULIANO'S, EXPERT DISCLOSURE PURSUANT TO
FED.R.CIV.P. 26(a) (2)

Now comes the Plaintiff and files the within Expert
Disclosure as follows:

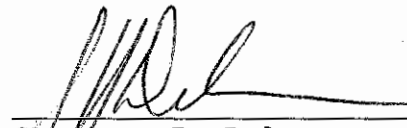
1. Plaintiff, Mark Uliano, may or will call Jay Portnow, M.D., Ph.D., 377 Belmont Street, Brockton, Massachusetts, to testify as a medical expert witness in his behalf.
2. Dr. Portnow's curriculum vitae is attached hereto as Exhibit "A".
3. Dr. Portnow's report dated March 1, 2003, on his treatment and examination of the Plaintiff is attached hereto as Exhibit "B".

4. It is anticipated at trial, Dr. Portnow will testify in accordance with his report and that his opinions rendered while testifying will be based upon his treatment of the Plaintiff, his examination of the Plaintiff, his review of the Plaintiff's medical records, and his education and experience as is set forth in Exhibits "A" and "B".

5. Dr. Portnow's fee for testifying at deposition is \$2,500 per half day, and \$5,000 per day for testimony in Court.

Respectfully submitted,

PLAINTIFF,
By his attorneys,

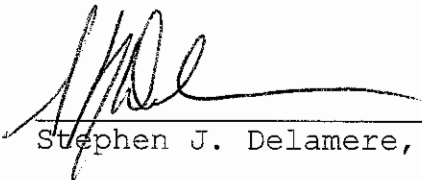


Stephen J. Delamere
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294 Pleasant Street, Suite 204
Stoughton, MA 02072
(781)297-0005

Dated: *Sept. 8, 2005*

CERTIFICATE OF SERVICE

I, Stephen J. Delamere, hereby certify that on the above date I caused a true and correct copy of Plaintiff's Expert Disclosure to be served upon Defendant Marie Bissel's counsel, James C. Crowley, Fuller, Rosenberg, Palmer & Beliveau, 340 Main Street, Worcester, MA 01608, Defendant Kenneth Tilden's counsel, Robert Turner, Avery, Dooley, Post & Avery, LLP, 90 Concord Avenue, Belmont, MA 02478, and Elton Watkins, III, Esq., 238 Essex Street, 2nd floor, Lawrence, MA 01840 by first class mail, postage prepaid.


Stephen J. Delamere, Esq.